

IN THE CROSS REFERENCE TO RELATED APPLICATIONS

(1) Please rewrite the Cross-Reference to Related Applications as follows:

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The present invention is related to the following U.S. Patent Application which is hereby incorporated herein by reference: Serial No. 09/740,251 entitled "Data Processing System and Method For Multi-Level Directory Searches" (Attorney Docket No. AUS9-2000-0732-US1).

REMARKS

Claims 1-27 are pending in the Application.

Claims 1-27 stand rejected.

I. OBJECTION TO THE SPECIFICATION

The specification has been objected to because the status of the copending application is not shown. The Applicants have amended the cross-reference to related applications to include the Serial Number of the copending related application.

II. OBJECTION TO THE DRAWINGS

The drawings have been objected to because FIGURE 1 shows only that which is old and therefore should be designated by the legend "Prior Art." The Applicants respectfully traverse the objection to the drawings. FIGURE 1 is expressly stated as depicting a representative LDAP directory service in which the present invention may be implemented. (Detailed Description, page 8, lines 1-2.) Consequently, FIGURE 1 does not only show that which is old in the art. The Applicants respectfully request that the objection to the drawings be withdrawn.

III. REJECTION UNDER 35 U.S.C. § 103

Claims 1-27 have been rejected under 35 U.S.C. § 103 as being unpatentable over *Bachmann et al.*, U.S. Patent No. 6,085,188 ("*Bachmann* ") in view of *Traversat et al.*, U.S. Patent No. 6,366,954 ("*Traversat*"). The Applicants respectfully traverse the rejection of claims 1-27 under 35 U.S.C. § 103.

Claim 1 is directed to a search method. The method includes determining if a first parameter has a first predetermined value. If the first parameter has the first predetermined value, the method returns a value of each of one or more selected members of a first node, the first node being referenced by a value of a first member of a second node in response to the first member of the second node having a predetermined type.

Bachmann allegedly discloses the limitations of claim 1 but for "said first node being referenced by a value of a first member of a second node in response to said first member of said second node having a predetermined type." (Paper No. 5, page 3.) The Applicants respectfully disagree. The aforementioned limitations of claim 1 are purportedly taught by *Bachmann* in disclosing a distinguished name (first parameter) and an EID (first parameter value). (Paper No. 5, page 3.) However, the EID is not a value of a distinguished name. *Bachmann* teaches that the EID is a unique identifier of an entry in an LDAP naming hierarchy. (*Bachmann*, column 5, lines 12-14.) A distinguished name (DN) is a concatenation of relative distinguished names (RDN) from the directory root to the entry, in which each RDN comprises an *attribute value* from each entry in the path from the entry to the root. (*Bachmann*, column 3, line 64 through column 4, line 4) (emphasis added). *Bachmann* further teaches that a DN is mapped to an EID. (*Bachmann*, column 6, lines 49-50.) Thus, an EID is not an attribute value, and accordingly not a value of a DN.

Bachmann admittedly does not teach the limitation in claim 1 drawn to "said first node being referenced by a value of a first member of a second node in response to said first member of said second node having a predetermined type." (Paper No. 5, page 3.)

Traversat is purported to teach the limitation admittedly missing in *Bachmann*. (*Id.*) The teaching that is alleged to teach the aforesaid limitation discloses, in its entirety:

One feature of the LDAP server is the absolute and relative naming conventions used to define the locations of data items, referred to as attributes or keys. Of particular relevance are the absolute names used to locate attributes in the LDAP directory. An absolute name includes a series of "distinguished names" which are similar to nodes in the JSD server. Generally, the LDAP model is based on entries. An entry is a collection of attributes. Such an entry is referred to as a distinguished name ("DN"). An attribute can have one or more values and belong to a particular type. Types are typically mnemonic strings such as un or u for user name, ml for email address, or o for organization. Each type has a collection of attributes. For example, un can have attributes such as common name, last name, and logon name, among others. The DN o can have the attributes mail and fax, each followed by one or more values. (Paper No. 5, page 3) (citing *Traversat*, column 6, lines 13-28).

This teaching discusses the general nature of attributes in LDAP. Plainly, this does not teach a first node being referenced by a value of a first member of a second node in response to said first member of said second node having a predetermined type.

A *prima facie* showing of obviousness requires, *inter alia*, that the references, alone or combined, teach or suggest all of the limitations of the claim. MPEP § 2143.03. All words in the claim must be considered when judging the patentability of the claim. *Id.* For at least the reasons hereinabove, *Bachmann* and *Traversat*, alone or in combination have not been shown to teach or suggest all of the limitations of claim 1.

Additionally, a *prima facie* showing of obviousness requires that there be some motivation or suggestion to combine the references to make the claimed invention. MPEP § 2143. The motivation or suggestion to combine the references must be found in the nature of the problem to be solved, the teaching of the prior art, or the knowledge of persons of ordinary skill in the art. MPEP § 2143.01.

The Examiner states that it would have been obvious to combine *Bachmann* and *Traversat* "to enable the user to store any type of data that may need to be accessed by users and provide a faster and more efficient method to support LDAP searches." (Paper No. 5, page 3.) This motivation is not identified in one of the three possible sources thereof. (See Paper No. 5, page 3.) Moreover, such broad conclusory statements are not evidence. See Teachings must be clear and particular, and broad conclusory statements regarding the teachings standing alone are not evidence. *In re Lee*, 277 F.3d 1338, 1343, 61 U.S.P.Q.2d 1430, 1433-34 (Fed. Cir. 2002); *In re Kotzab*, 217 F.3d 1365, 1370, 55 U.S.P.Q.2d 1313, 1317 (Fed. Cir. 2000); *In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1616 (Fed. Cir. 1999). Furthermore, it is illogical that a generic recitation that combining teachings of the references allows the resulting system to be faster and more efficient is sufficient motivation for a *prima facie* showing of obviousness. If that were sufficient, then the requirement that there be some motivation or suggestion for combining references would simply disappear. It could always be said that the resulting combination leads to faster and more efficient performance of the combination. It is a rare circumstance indeed that an element would be incorporated in a claimed invention to diminish the performance thereof.

For at least the aforesaid reasons, the Applicants respectfully assert that a *prima facie* showing of obviousness has been made with respect to claim 1, and therefore claim 1 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103

Claim 10 has been rejected on the same ground as claim 1 as being directed to a computer program product embodied in a tangible storage medium including programming instructions for performing the operations of the method of claim 1. (Paper No. 5, page 3.) (The Applicants note that the citation to *Bachmann* is directed to a database, not a computer program product for performing the method of claim 1. Indeed, by the admittedly missing teaching in *Bachmann*, there could be no such teaching.) Consequently, for at least the reasons discussed in conjunction with claim 1, claim 10 is also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 2 is directed to the method of claim 1 and further including determining if a second member of the second node matches a value of a second parameter. Claim 2 has been rejected on teaching in *Bachmann* directed to performing a one-level search against a LDAP directory implemented using a relational database as a backing store. (Paper No. 5, page 4) (citing *Bachmann*, column 7, lines 40-51). This operation is effected in *Bachmann* by determining two sets of EIDs. (*Bachmann*, FIGURE 10 and column 7, lines 42-48.) As an initial matter, as discussed above, EIDs, as taught in *Bachmann* are not search filter parameters. The first set of EIDs that correspond to entries matching the search parameters. (*Bachmann*, FIGURE 10 and column 7, lines 42-43.) The second set of EIDs constitute the children EIDs of the base entry. (*Bachmann*, FIGURE 10 and column 7, lines 45-48.) (This is what ultimately makes the search a one-level search.) The values output are the attribute values corresponding to the intersection of the two sets. (*Bachmann*, FIGURE 10 and column 7, lines 48-54.) Thus, there is nothing in this teaching of *Bachmann* that discloses determining if a second member of the second node matches a value of a second parameter, in which a first member of the second node has a value referencing a first node.

Consequently, neither *Bachmann* nor *Traversat*, alone or in combination have been shown to teach or suggest all of the limitations of claim 2. Additionally, no further motivation for combining or modifying the references has been provided beyond that stated with respect to claim 1. (See Paper No. 5, page 4.) Thus, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 2, and claim 2 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 11 and 20 have been rejected on the same ground as claim 2 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 2. (Paper No. 5, page 4.) Consequently, for at least the reasons discussed in conjunction with claim 2, claims 11 and 20 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 3 further depends from claim 2 and recites the method thereof wherein the step of returning the value of each of one or more members of the first node is in response to the second member of the second node matching the value of the second parameter. Claim 3 has been rejected on the teaching in *Bachmann* directed to performing a one-level search against a LDAP directory implemented using a relational database as a backing store, discussed above in conjunction with claim 2. (Paper No. 5, page 4) (citing *Bachmann*, column 7, lines 51-59). As an initial matter, the Applicants note that the teaching in *Bachmann* at lines 51-55 has been addressed above. The remaining teaching relied upon discloses that after testing all EIDs in the first set, an end of search command is sent and the routine terminates. (*Bachmann*, column 7, lines 55-59.) Plainly, the latter teaching has nothing to do with returning a value of each of one or more members of a node. With respect to the teaching directed to returning entry data when the EIDs in the two sets compare (outcome positive), there is nothing in that teaching that discloses returning a value of one or more members of the first node in response to a second member of the second node matching a value of a second parameter. Note further, as discussed in conjunction with claim 1, that EIDs as taught in *Bachmann* are not parameters. They are a feature of the backing store implementation in *Bachmann* and are not parameters as understood by those of ordinary skill in the relevant art.

Claims 12 and 21 have been rejected on the same ground as claim 3 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 3. (Paper No. 5, page 4.) Consequently, for at least the reasons discussed in conjunction with claim 3, claims 12 and 21 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 4 is directed to the method of claim 1 and further including returning values of a selected set of members of the second node. Claim 4 has been rejected on the teaching in *Bachmann* directed to performing a one-level search against a LDAP directory implemented using a relational database as a backing store, discussed above in conjunction with claims 2 and 3. (Paper No. 5, page 4) (citing *Bachmann*, FIGURE 10,

step 114, and related text). In view of the teaching in *Bachmann* with respect to the one-level search discussed above, there is nothing in this teaching of *Bachmann* that discloses returning values of a selected set of members of the second node, in which a first member of the second node has a value referencing a first node.

Consequently, neither *Bachmann* nor *Traversat*, alone or in combination have been shown to teach or suggest all of the limitations of claim 4. Additionally, no further motivation for combining or modifying the references has been provided beyond that stated with respect to claim 1. (See Paper No. 5, page 4.) Thus, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 4, and claim 4 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 13 and 22 have been rejected on the same ground as claim 4 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 4. (Paper No. 5, page 4.) Consequently, for at least the reasons discussed in conjunction with claim 4, claims 13 and 22 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 5 further depends from claim 4 and recites the method thereof and further including determining if a second member of the second node matches a value of a second parameter, and wherein the step of returning values of the selected set of members of the second node is in response to the second member of the second node matching the value of the second parameter. Claim 5 has been rejected on the teaching in *Bachmann* discussed above in conjunction with claim 4, and with respect to the limitation directed to the returning the values of the selected set in response to the matching the value of the second parameter, teaching in *Traversat* directed to a process for retrieving configuration data from the LDAP directory service when the data item is not available on the JSD server. (Paper No. 5, page 4) (citing *Traversat*, column 12, lines 1-31). As an initial matter, *Traversat* is directed to systems and methods for mapping an attribute or entry on an LDAP directory service to a configuration server

schema, in particular the Java Server Database (JSD). (*Traversat*, column 5, lines 39-43.) In accordance with the teaching allegedly disclosing the aforementioned limitation of claim 5, the JSD server searches for a match between high-level paths of the JSD server schema and the LDAP hierarchical structure. (*Traversat*, column 12, lines 1-8.) This is done using a high-level path map which is a map between each high-level JSD path and a corresponding LDAP hierarchical path consisting of distinguished names. (*Traversat*, column 12, lines 8-22; column 11, lines 42-54.) Once a corresponding LDAP high-level path name is identified, a search is performed in the LDAP database "under" the high-level path name previously identified. (*Traversat*, column 12, lines 22-25.) In searching for the attribute not corresponding to a property in the JSD server schema, a metadirectory of LDAP types and associated attributes is used. (*Traversat*, column 12, lines 25-31; column 11, lines 21- 30.) Although the Applicants are unsure which teaching in this disclosure of *Traversat* are purported to teach the returning of the selected set of members of the second node in response to the second member of the second node matching the value of the second parameter, the Applicants note that the process relied upon is performed when the requested item is not available on the JSD server. (*Traversat*, column 12, lines 1-4.) In any case, by the plain terms of the teaching, there is no disclosure directed to returning of the selected set of members of the second node in response to the second member of the second node matching the value of the second parameter.

With respect to a motivation for combining references, the Examiner states the same motivation as asserted with respect to claim 1, namely to provide a faster and more efficient LDAP search. (Paper No. 5, page 5.) This motivation has been addressed above in conjunction with claim 1, and the Applicants' analysis also applies to the aforesaid motivation.

Thus, for at least these reasons, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 5, and claim 5 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 14 and 23 have been rejected on the same ground as claim 5 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 5. (Paper No. 5, page 4.) Consequently, for at least the reasons discussed in conjunction with claim 5, claims 14 and 23 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103. _

Claim 6 is directed to the method of claim 1 and further including if the first parameter has the first predetermined value, returning a value of each of one or more selected members of a third node, the third node being referenced by a value of a first member of the first node in response to the first member of the first node having the predetermined type. Claim 6 has been rejected on the same teaching in *Traversat* discussing an exemplary LDAP directory tree having a total of eight nodes, three of type "c", two of type "o", two of type "bu" and one of type "u." (See Paper No. 5, page 5; citing *Traversat*, column 6, lines 45-67; *Traversat* FIGURE 2A). The aforesaid teaching in *Traversat* also discloses that the type "u" node has a list of attributes followed by one or more values, which in many LDAP implementations must be in either string or binary form. (*Traversat*, column 6, lines 64-67.) Plainly, the teaching referred to in *Traversat* does not disclose if the first parameter has the first predetermined value, returning a value of each of one or more selected members of a third node, the third node being referenced by a value of a first member of the first node in response to the first member of the first node having the predetermined type.

With respect to a motivation for combining references, the Examiner states the same motivation as asserted with respect to claim 1, namely to provide a faster and more efficient LDAP search. (Paper No. 5, page 5.) This motivation has been addressed above in conjunction with claim 1, and the Applicants' analysis also applies to the aforesaid motivation.

Thus, for at least the aforesaid reasons, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 5, and claim 5 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 15 and 24 have been rejected on the same ground as claim 6 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 6. (Paper No. 5, page 4.) (The Office Action refers to claim 25, however the Applicants understand this to be a typographical error.) Consequently, for at least the reasons discussed in conjunction with claim 6, claims 15 and 24 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 7 further depends from claim 6 and recites the method wherein the selected members of the first node and the selected members of the third node are selected in response to a value of a second parameter. Claim 7 has been rejected on teaching in *Traversat* directed to LDAP contexts in which each context has one absolute name schema. (Paper No. 5, page 6) (citing *Traversat*, column 7, lines 16-34). This discloses, in its entirety:

Each context has one absolute name schema defined (typically by a network administrator) when a context is created. The absolute naming schema or convention in LDAP is a list of DNs. FIG. 2B is an illustration of a name schema and associated attributes reflecting the hierarchical structure of FIG. 2A in an LDAP directory service. The naming configuration or hierarchy begins at distinguished name "c=US" 214 on the right side of the name schema. The DN c can have any one of a number of values representing different countries. The next distinguished name o=Sun 216 represents the next level down in the hierarchy. In this example, DN o represents "organization" and can have string values representing other organizations or companies. The DNs to the left get more specific: bu representing business unit 218 and u representing a user 220. Each distinguished name or type has a set of attributes. For example, distinguished name u=Jonathan A. Smith 220 has a set of specific attributes 212 described initially in FIG. 2A. The entire string of DNs 222 is referred to as an absolute address or sometimes a full DN.

(*Traversat*, column 7, lines 16-34.)

Plainly, the express language of this teaching evidences that *Traversat* does not disclose that selected members of the first node (recited in claim 1) and the selected

members of the third node (as recited in claim 6) are selected in response to a value of a second parameter.

Consequently, neither *Bachmann* nor *Traversat*, alone or in combination have been shown to teach or suggest all of the limitations of claim 7. Additionally, no further motivation for combining or modifying the references has been provided beyond that stated with respect to claim 1. (See Paper No. 5, page 6.) Thus, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 7 and claim 7 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 16 and 25 have been rejected on the same ground as claim 7 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 7. (Paper No. 5, page 6.) (The Office Action refers to claim 26, however the Applicants understand this to be a typographical error.) Consequently, for at least the reasons discussed in conjunction with claim 7, claims 16 and 26 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 8 is directed to the method of claim 1 wherein the first parameter comprises a parameter of a set of parameters in a search request. While the Applicants do not dispute that *Bachmann* and *Traversat* teach search parameters, claim 8 is not directed to a search parameter in isolation. Neither *Bachmann* nor *Traversat*, alone or in combination, teaches a first parameter as recited in claim 8, and necessarily do not teach a first parameter comprising a parameter comprising a parameter in a search request. In other words, neither *Bachmann* nor *Traversat* teach a search parameter such that in response to the search parameter having a first predetermined value, one or more values of selected members of a first node are returned in response to a first member of a second node having a predetermined type.

Consequently, neither *Bachmann* nor *Traversat*, alone or in combination have been shown to teach or suggest all of the limitations of claim 8. Additionally, no further

motivation for combining or modifying the references has been provided beyond that stated with respect to claim 1. (See Paper No. 5, page 6.) Thus, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 8 and claim 8 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 17 and 26 have been rejected on the same ground as claim 8 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 8. (Paper No. 5, page 6.) Consequently, for at least the reasons discussed in conjunction with claim 8, claims 16 and 26 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claim 9 further depends from claim 8 and recites the method wherein the search request comprises a Lightweight Directory Access Protocol (LDAP) search request. Again, while the Applicants do not dispute that *Bachmann* and *Traversat* teach LDAP searches, claim 9 is not directed to LDAP searches in isolation. Because, as discussed in conjunction with claim 8, neither *Bachmann* nor *Traversat* teach search requests as recited therein, they necessarily do not teach such requests as LDAP requests.

Consequently, neither *Bachmann* nor *Traversat*, alone or in combination have been shown to teach or suggest all of the limitations of claim 9. Additionally, no further motivation for combining or modifying the references has been provided beyond that stated with respect to claim 1. (See Paper No. 5, page 6.) Thus, the Applicants respectfully assert that a *prima facie* showing of obviousness has not been made with respect to claim 9 and claim 9 is allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

Claims 18 and 27 have been rejected on the same ground as claim 9 as being directed to a computer program product including programming instructions, and circuitry, respectively, for performing the operations of the method of claim 9. (Paper No. 5, page 6.) Consequently, for at least the reasons discussed in conjunction with

claim 9, claims 18 and 27 are also allowable over *Bachmann* and *Traversat* under 35 U.S.C. § 103.

IV. CONCLUSION

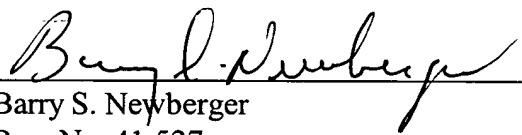
As a result of the foregoing, it is asserted by the Applicants that the remaining claims in the Application are in condition for allowance, and respectfully request an early allowance of such claims.

Applicant respectfully request that the Examiner call Applicants' attorney at the below listed number if the Examiner believes that such a discussion would be helpful in resolving any remaining problems.

Respectfully submitted,

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VERSION TO SHOW CHANGES MADE

IN THE CROSS REFERENCE TO RELATED APPLICATIONS

(1) The Cross-Reference to Related Applications has been rewritten as follows:

The present invention is related to the following U.S. Patent Application which is hereby incorporated herein by reference: Serial No. 09/740,251 entitled "Data Processing System and Method For Multi-Level Directory Searches" (Attorney Docket No. AUS9-2000-0732-US1).

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